

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOEL DEUTSCH, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

STATUS RESEARCH & DEVELOPMENT
GMBH, JARRAD HOPE, and CARL
BENNETTS,

Defendants.

No. 1:20-cv-02815-NRB

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Status Research & Development GmbH (“Status”), Carl Bennetts, and Jarrad Hope (“Defendants”), upon the accompanying Memorandum of Law In Support of Defendants’ Motion to Dismiss the Third Amended Complaint and the Declaration of Tibor L. Nagy, Jr. and the exhibits annexed thereto, will move this Court, before the Honorable Naomi Reice Buchwald, to dismiss Plaintiff’s Third Amended Complaint, dated November 12, 2020, for failure to state a claim upon which relief can be granted for reasons more fully explained in the accompanying memorandum.

WHEREFORE, Defendants respectfully request that this Court dismiss the Complaint in its entirety and grant such other relief as the Court may consider appropriate.

Dated: December 3, 2020

/s/ Tibor L. Nagy, Jr.

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Status Research & Development

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Bennetts